TEXAS BEEF

COMMENT ON NAIS

The most recent plan [NAIS] announced in early May is improved from the previous USAIP plan. There remain serious and critical flaws in the plan. The problems are both fundamental and structural and require cooperation with industry participants in order to achieve a workable plan capable of serving the needs of the beef industry and the beef consumer.

Timetable.

The most harmful design flaw is the timetable. It is difficult to see how a plan implementation in 2009 will help the current crisis in the export markets where individual identification and aging is critical to acceptance of U.S. beef. It is also difficult to understand how the almost $50 million dollars spent by USDA on pilot programs will move the process along. Much of the money will be or has been spent sending officials off in conflicting directions and creating false impressions with users of the final form of the program. The pilots have established competing power bases – all with ideas of a major role in the future program.

Governance.

The current plan is a mandatory alternative, offered by USDA, to a NCBA proposal to privatize the program. There is little rationale for two programs and there exist no structural problem for combining the two plans. The only difference between the two plans is NCBA's broader view of the applications of the data-store providing beef producers additional information on production processes and tracking the ownership chain. The architecture for the data-store and transports for submitting data will cost approximately the same under either plan. Under NAIS, the ownership and administration of the national database will be under APHIS and USDA. NCBA has proposed privatizing the data-store.

Neither plan should move forward without first solving the governance issue. NCBA and USDA should negotiate and agree to representation and establish a Governance Board with composition to include stakeholders from business and government. The Governing Board should then submit a plan with the full support of industry and government offering beef producers and health officials a clear and unified plan architecture. The Governing Board should be

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specific to beef although certain members might coordinate with boards from other species. Each species has interest specific to the production of that species and multi-species design would dilute and delay the project.

Premise.

Separate States and Tribes will determine the rules for accepting and defining a premise. The guidelines provide for either a physical address or a legal description but the database provides no definition of the format for the legal description of the premise. This confusion resulting from differences in premise qualifications or definitions from State to State will present both traceback difficulties and operational and logistical questions. Cattle operations, located in several states, will not be able to use compatible systems for handling cattle locations and movements leading to confusion and error.

It is a mistake to allow different premise rules across States and equally wrong to establish State managed databases which require constant updating with the national database. Many States also are anticipating fee income streams from applications, renewals and inspections – adding unnecessary cost burdens to the system. The important role of State health officials will not be compromised by hosting the premise ID at the national level.

Furthermore, the plan does not envision premise boundaries leaving open critical traceback issues regarding animal locations and co-mingling. Any successful plan must use GPS parameters or clearly defined mapping formats. Current premise definitions and parameters exist already at the Farm Service Administration. To ignore this resource is a mistake. The FSA offices across the country currently provide local contact offices and working relationships with both land owners and operators.

The plan also neglects to consider the relevance and importance of the operator of the land as an equal partner in establishing premise ID for cattle operations. Traceback to the land owner in many instances will rely on someone who has little or no knowledge of the cattle operations on the property.

Group or lot ID.

Animals under the new plan can be identified by a lot or group that will remain intact during the progress through the production cycle. In the commercial world of beef production, some groups do hold their identity throughout the growing and finishing stages of production. A Nebraska breeder might hold a calf crop in one lot and then send the group intact to the feedyard for finishing. For every situation like this, however, there exists many more commercial operations where cattle are routinely mixed. The plan

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must have a design that anticipates the worse case scenario rather than a plan designed to fit the best case scenario.

To allow groups to be submitted for ID purposes will only create a vulnerability that will likely compromise the entire program when a media investigative reporter discovers the lack of integrity in the Group ID system. It would not be unusual for cattle from Mexico to be sorted and commingled with domestic groups from multiple locations making it virtually impossible in the event of a health issue, to trace an infected animal. Allowing group identification will destroy the integrity necessary for an ID plan to gain trust with consumers and foreign purchasers of U.S. beef.

Datastore, Datashare and Privacy.

Nothing is more important to the cost and value of the ID program than defining the nature and structure of the data shared in the ID plan. This requires the plan to carefully define the record structures beyond the basic file structure set forth in NAIS. Industry needs are broader and the data-store should include all records relevant to the production and ownership of the beef animals. The data-store should include information on production, chain of ownership, and carcass data. Permissions or access to private information should be carefully defined in the plan and submitted for comment to the industry. The data-store should be privately owned by the owners of the cattle and operated in trusts by the Governance Board.

The transport for sharing data is critical to the cost of the system. XML is a file structure for sharing data across the web and USDA has failed to include this technology in their plan. XML allows all users to share information in a structured and hands free environment. This means information does not necessarily require multiple data entry points. A schema can be provided to the industry so participants can move data from private networks to the national datastore with easy and simplicity. This will facilitate the data verification standards so necessary to a sound program.

The Data-store and Data-share will be species specific and too large reliance on multi-species records and file formats will prohibit the proper use and sharing of the data. The USDA plan is written for multi-species identification but the beef industry has many needs specific to the industry apart from generic formats.

Tags and readers. Restricting animal identification to RFID is too restrictive. RFID may be the best option currently but any well designed plan must include room for emerging technologies. Commercial scanners or readers must be able to manage large scale commercial operations. Current technologies with RFID fail to identify multiple cattle moving down a working cattle alley. Current ID requires capture in a squeeze chute which is often unnecessary or impractical at the site of the movement.

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Closing. USDA has a goal -- 48 hour traceback for animal disease. This is an important goal for animal identification but it is hardly sufficient for an industry that must change and rely on much more from a national ID program. The interest and needs of the industry can not be fairly or properly represented without industry input and representation on the Governance Board. USDA and NCBA need to consolidate their plans and include those requirements that are so necessary to the emergence of a thriving beef industry.

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